

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION**

THIS DOCUMENT RELATES TO:

3:18-cv-00089 (MAS) (LHG) (Hound
Partners)

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP
JUDGE RUKHSANAH L. SINGH

JUDGE DENNIS CAVANAUGH, RET.
SPECIAL MASTER

NOTICE OF CONSOLIDATED MOTION TO FILE UNDER SEAL

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant Valeant Pharmaceuticals International, Inc. (“Valeant”), shall move this Court pursuant to L. Civ. R. 5.3, for entry of an order granting this consolidated motion to seal (i) designated portions of Valeant’s Letter to The Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) (3:15-cv-07658 Dkt. No. 1039, “Letter”), and (ii) Exhibit D attached to the Letter.

PLEASE TAKE FURTHER NOTICE that Valeant will rely on the Declaration of Matthew A. Sklar submitted in support of this consolidated motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order accompanies this Notice of Motion as Exhibit 3.

Dated: October 12, 2022

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/s/ Matthew Sklar

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